

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

MAY 24 2023

MITCHELL R. ELFERS
CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**RONALDO GALINDO LOPEZ-
ESCOBAR, a.k.a. "Tio Roni,"
ROSA ADRIANA LOPEZ-ESCOBAR,
a.k.a. "Tia Rosa," a.k.a. "Maria Alvarez-
Estrada,"
JOSE DENILSON LOPEZ-CHILEL,
a.k.a. "Andres,"
JOSE GIANLUCA LOPEZ-PEREZ, a.k.a
"Andres,"
JUNIOR VANEGAS-PORTILLO,
DEYSI MARISELA LOPEZ-
AMBROSIO,
MILDRED YANIRA LOPEZ-
AMBROSIO,
FRANKLIN LEONARDO CHILEL-
RAMIREZ,
CARLOS CHAVEZ-HERNANDEZ,
and SEBASTIAN ROLANDO CORTEZ,**

Defendants.

CRIMINAL NO. 23-768 KG

8 U.S.C. § 1324(a)(1)(A)(v)(I):
Conspiracy to Bring In, Transport, and
Harbor Illegal Aliens.

INDICTMENT

The Grand Jury charges:

From on or about October 16, 2021, and continuing to on or about April 6, 2023, in Luna County, Hidalgo County, and Doña Ana County in the District of New Mexico, and elsewhere, the defendants, **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. "Tio Roni," ROSA ADRIANA LOPEZ-ESCOBAR, a.k.a. "Tia Rosa," a.k.a. "Maria Alvarez-Estrada," JOSE DENILSON LOPEZ-CHILEL, a.k.a. "Andres," JOSE GIANLUCA LOPEZ-PEREZ, JUNIOR VANEGAS-PORTILLO, DEYSI MARISELA LOPEZ-AMBROSIO, MILDRED**

YANIRA LOPEZ-AMBROSIO, FRANKLIN LEONARDO CHILEL-RAMIREZ, CARLOS CHAVEZ-HERNANDEZ, and SEBASTIAN ROLANDO CORTEZ, combined, conspired, confederated, agreed, and acted interdependently with other persons whose names are known and unknown to the Grand Jury to commit an offense defined in 8 U.S.C. § 1324(a)(1)(A)(i)-(iii), specifically, bringing in, transporting, and harboring illegal aliens.

In violation of 8 U.S.C. § 1324(a)(1)(A)(v)(I).

Manner and Means

The manner and means by which the defendants, RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. “Tio Roni,” ROSA ADRIANA LOPEZ-ESCOBAR, a.k.a. “Tia Rosa,” a.k.a. “Maria Alvarez-Estrada,” JOSE DENILSON LOPEZ-CHILEL, a.k.a. “Andres,” JOSE GIANLUCA LOPEZ-PEREZ, JUNIOR VANEGAS-PORTILLO, DEYSI MARISELA LOPEZ-AMBROSIO, MILDRED YANIRA LOPEZ-AMBROSIO, FRANKLIN LEONARDO CHILEL-RAMIREZ, CARLOS CHAVEZ-HERNANDEZ, and SEBASTIAN ROLANDO CORTEZ sought to accomplish the objectives of the conspiracy included, among other things, the following:

It was part of the conspiracy that beginning on a date unknown no later than 2021, RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. “Tio Roni,” organized and led a transnational criminal organization with associates in Guatemala, Mexico, and the United States (collectively, the “Lopez Crime Family”).

It was further part of the conspiracy that co-conspirators of RONALDO GALINDO LOPEZ-ESCOBAR coordinated and facilitated the smuggling of Central Americans through Mexico and into the United States in Southwestern New Mexico and elsewhere.

It was further part of the conspiracy that upon smuggling undocumented aliens into the United States through Southern New Mexico, ROSA ADRIANA LOPEZ-ESCOBAR, a.k.a.

“Tia Rosa,” a.k.a. “Maria Alvarez-Estrada,” would oversee and direct a network of mid-level smugglers, including JOSE DENILSON LOPEZ-CHILEL, JOSE GIANLUCA LOPEZ-PEREZ, JUNIOR VANEGAS-PORTILLO, and FRANKLIN LEONARDO CHILEL-RAMIREZ who recruited and directed foot guides, drivers, and caretakers and who facilitated the bringing in, transportation, and harboring of undocumented aliens while in the United States on behalf of the Lopez Crime Family to include CARLOS CHAVEZ-HERNANDEZ, SEBASTIAN ROLANDO CORTEZ, and others.

It was further part of the Conspiracy that JOSE DENILSON LOPEZ-CHILEL, JOSE GIANLUCA LOPEZ-PEREZ, JUNIOR VANEGAS-PORTILLO, and FRANKLIN LEONARDO CHILEL-RAMIREZ, directed foot guides, drivers, and caretakers to pick up undocumented aliens in Luna County and Hidalgo County, New Mexico and transport them to stash houses, including ROSA ADRIANA LOPEZ-ESCOBAR’s stash house in Phoenix, Arizona and then later to the undocumented aliens’ final destinations within the United States.

It was further part of the conspiracy that JOSE DENILSON LOPEZ-CHILEL, JOSE GIANLUCA LOPEZ-PEREZ, JUNIOR VANEGAS-PORTILLO, FRANKLIN LEONARDO CHILEL-RAMIREZ, CARLOS CHAVEZ-HERNANDEZ, and SEBASTIAN ROLANDO CORTEZ would transport and harbor undocumented aliens at Lopez Crime Family stash locations and to final destinations on behalf of the Lopez Crime Family.

It was further part of the conspiracy that DEYSI MARISELA LOPEZ-AMBROSIO and MILDRED YANIRA LOPEZ-AMBROSIO made payments of funds derived from the Lopez Crime Family’s alien smuggling activity through peer-to-peer money transfer applications to coconspirators on behalf of the leadership of the Lopez Crime Family, including RONALDO GALINDO LOPEZ-ESCOBAR.

Overt Act One

In 2021, JOSE DENILSON LOPEZ-CHILEL hired Co-Conspirator 1 to pick up a group of undocumented aliens in New Mexico and transport the group in exchange for money.

Overt Act Two

On or about October 16, 2021, JOSE DENILSON LOPEZ-CHILEL provided Co-Conspirator 1 with a location of where to pick up and drop off the group of undocumented aliens.

Overt Act Three

On or about October 16, 2021, upon Co-Conspirator 1 successfully picking up the group of undocumented aliens and beginning to transport the group via motor vehicle, JOSE DENILSON LOPEZ-CHILEL drove in tandem with Co-Conspirator 1 in a second motor vehicle until Co-Conspirator 1 was apprehended by Border Patrol agents after failing to yield to a Border Patrol traffic stop.

Overt Act Four

On or about October 28, 2021, ROSA ADRIANA LOPEZ-ESCOBAR directed Co-Conspirator 2 to transport an undocumented alien from Phoenix, Arizona, to the undocumented alien's final destination in Los Angeles, California, and collect the smuggling fee from the undocumented alien's sponsor upon dropping off the undocumented alien at his/her final destination.

Overt Act Five

On or about October 28, 2021, ROSA ADRIANA LOPEZ-ESCOBAR instructed Co-Conspirator 2 to wire \$9,200 of the smuggling fee, for an undocumented alien, to recipient(s) in Guatemala and to keep \$1,000 as payment.

Overt Act Six

On or about December 15, 2021, ROSA LOPEZ-ESCOBAR instructed JOSE GIANLUCA LOPEZ-PEREZ to pick up a group of undocumented aliens at a location near Deming, New Mexico.

Overt Act Seven

On or about December 15, 2021, JOSE GIANLUCA LOPEZ-PEREZ travelled, via motor vehicle, as instructed by ROSA LOPEZ-ESCOBAR, to the predetermined location near Deming, New Mexico, where he intended to pick up a group of undocumented aliens who were later apprehended by Border Patrol agents.

Overt Act Eight

On or about January 11, 2022, DEYSI MARISELA LOPEZ-AMBROSIO sent Co-Conspirator 3 a \$1,500 Zelle deposit into his/her bank account that was funds derived from alien smuggling and was intended to be paid to other co-conspirators.

Overt Act Nine

On or about February 4, 2022, JUNIOR VANEGAS-PORTILLO instructed CARLOS CHAVEZ-HERNANDEZ to pick up a group of undocumented aliens at a location near Animas, New Mexico.

Overt Act Ten

On or about February 4, 2022, JUNIOR VANEGAS-PORTILLO provided CARLOS CHAVEZ-HERNANDEZ with a motor vehicle to use to pick up and transport the group of undocumented aliens that was at a location near Animas, New Mexico.

Overt Act Eleven

On or about February 4, 2022, SEBASTIAN ROLANDO CORTEZ, who was working with CARLOS CHAVEZ-HERNANDEZ, driving in a second motor vehicle, picked up a group

of undocumented aliens near Animas, New Mexico, and proceeded to transport the group of undocumented aliens until CARLOS CHAVEZ-HERNANDEZ and SEBASTIAN ROLANDO CORTEZ were apprehended by Border Patrol agents.

Overt Act Twelve

On or about March 15, 2022, DEYSI MARISELA LOPEZ-AMBROSIO sent Co-Conspirator 3 a \$1,500 Zelle deposit into his/her bank account that was funds derived from alien smuggling and was intended to be paid to other co-conspirators.

Overt Act Thirteen

On or about March 30, 2022, DEYSI MARISELA LOPEZ-AMBROSIO sent Co-Conspirator 3 a \$3,000 Zelle deposit into his/her bank account that was funds derived from alien smuggling and was intended to be paid to other co-conspirators.

Overt Act Fourteen

On or about April 7, 2022, JUNIOR VANEGAS-PORTILLO instructed Co-Conspirator 4 to travel to a location near Hachita, New Mexico, to pick up and transport a group of undocumented aliens back to a stash location in Phoenix, Arizona, operated by ROSA LOPEZ-ESCOBAR in exchange for money.

Overt Act Fifteen

On or about April 7, 2022, at the instruction of JUNIOR VANEGAS-PORTILLO, Co-Conspirator 4 picked up and transported a group of undocumented aliens until Co-Conspirator 4 was apprehended by Border Patrol agents.

Overt Act Sixteen

On or about April 27, 2022, MILDRED YANIRA LOPEZ-AMBROSIO sent Co-Conspirator 3 a \$2,000 Zelle deposit into his/her bank account that was funds derived from alien smuggling and was intended to be paid to other co-conspirators.

Overt Act Seventeen

On or about April 27, 2022, DEYSI MARISELA LOPEZ-AMBROSIO sent Co-Conspirator 3 a \$500 Zelle deposit into his/her bank account that was funds derived from alien smuggling and was intended to be paid to other co-conspirators.

Overt Act Eighteen

On or about June 3, 2022, DEYSI MARISELA LOPEZ-AMBROSIO sent Co-Conspirator 3 two Zelle deposits totaling \$3,500 into his/her bank account that was funds derived from alien smuggling and was intended to be paid to other co-conspirators.

Overt Act Nineteen

On or about June 5, 2022, DEYSI MARISELA LOPEZ-AMBROSIO sent Co-Conspirator 3 two Zelle deposits totaling \$2,000 into his/her bank account that was funds derived from alien smuggling and was intended to be paid to other co-conspirators.

Overt Act Twenty

On or about June 7, 2022, JUNIOR VANEGAS-PORTILLO instructed Co-Conspirator 4 to travel to a location near Deming and Lordsburg, New Mexico, to pick up and transport a group of undocumented aliens back to a stash location in Phoenix, Arizona, operated by ROSA LOPEZ-ESCOBAR in exchange for money.

Overt Act Twenty-One

On or about June 7, 2022, at the instruction of JUNIOR VANEGAS-PORTILLO, Co-Conspirator 4 picked up and transported a group of undocumented aliens until Co-Conspirator 4 was apprehended by Border Patrol agents.

Overt Act Twenty-Two

On or about August 8, 2022, MILDRED YANIRA LOPEZ-AMBROSIO sent Co-Conspirator 3 a \$3,500 Zelle deposit into his/her bank account that was funds derived from alien smuggling and was intended to be paid to other co-conspirators.

Overt Act Twenty-Three

In January 2023, JOSE DENILSON LOPEZ-CHILEL, via telephonic communications, hired Co-Conspirator 5, to pick up and transport a group of undocumented aliens in exchange for money.

Overt Act Twenty-Four

On January 15, 2023, JOSE DENILSON LOPEZ-CHILEL and FRANKLIN LEONARDO CHILEL-RAMIREZ, instructed Co-Conspirator 5 where to pick up a group of undocumented aliens that Co-Conspirator 5 had previously agreed to transport in exchange for money.

Overt Act Twenty-Five

On or about January 15, 2023, at the instruction of JOSE DENILSON LOPEZ-CHILEL and FRANKLIN LEONARDO CHILEL-RAMIREZ, Co-Conspirator 5 picked up a group of undocumented aliens before failing to yield to a Border Patrol traffic stop.

FORFEITURE ALLEGATION

Upon conviction of any offense in violation of 8 U.S.C. § 1324, the defendants, **RONALDO GALINDO LOPEZ-ESCOBAR, a.k.a. "Tio Roni," ROSA ADRIANA LOPEZ-ESCOBAR, a.k.a. "Tia Rosa," a.k.a. "Maria Alvarez-Estrada," JOSE DENILSON LOPEZ-CHILEL, a.k.a. "Andres," JOSE GIANLUCA LOPEZ-PEREZ, JUNIOR VANEGAS-PORTILLO, DEYSI MARISELA LOPEZ-AMBROSIO, MILDRED YANIRA LOPEZ-AMBROSIO, FRANKLIN LEONARDO CHILEL-RAMIREZ, CARLOS CHAVEZ-HERNANDEZ, and**

SEBASTIAN ROLANDO CORTEZ, shall forfeit to the United States, pursuant to 18 U.S.C. §§ 982(a)(6), any conveyance used in the commission of the offense and any property, real or personal, that constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the offense of conviction or that was used to facilitate, or was intended to be used to facilitate, the commission of the offense. The property to be forfeited includes, but is not limited to, the following:

1. MONEY JUDGMENT

A sum of money representing property involved in the offense set forth in the Count of conviction and any property traceable to such property.

2. PERSONAL PROPERTY


- a. All funds contained in Bank of America Checking Account ending in 8095 associated with DEYSI MARISELA LOPEZ-AMBROSIO;
- b. All funds contained in Wells Fargo Checking Account ending in 0651 associated with DEYSI MARISELA LOPEZ-AMBROSIO;
- c. All funds contained in Bank of America Checking Account ending in 3439 associated with MILDRED YANIRA LOPEZ-AMBROSIO; and

If any of the property described above, as a result of any act or omission of the defendant[s]:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL:



Assistant United States Attorney
5/23/2023 5:21 PM

/S/
FOREPERSON OF THE GRAND JURY